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ABSTRACT

The Social Security Administration (SSA) is not complying with Equal Employment Opportunity Commission (EEOC) program requirements according to a report by the General Accounting Office (GAO). It found that although the overall ratio of blacks employed at SSA headquarters increased from 1982 to 1985, underrepresentation of blacks--especially black men--remains an issue in the SSA components and job series GAO reviewed. While black women are fully represented in most job series through the grade 12 level, they are underrepresented at grades 13 to 15. Black men are generally underrepresented at most grade levels. Some elements of SSA's and its components' affirmative action plans have not been implemented. Some of the planned efforts cannot be satisfactorily monitored or evaluated because SSA does not compile and analyze Commission-required applicant flow data. Therefore, SSA's components cannot evaluate their affirmative action efforts to identify possible employment barriers to underrepresented minority groups, and SSA cannot develop and implement effective strategies to reduce or eliminate obstacles which may hamper minorities' advancement opportunities. The report details GAO findings, conclusions and recommendations. Also included are SSA comments on the report. Several tables and charts illustrate findings. (PS)

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United States General Accounting Office

GAO

Report to the Honorable Parren J. Mitchell, House of Representatives

January 1987

AFFIRMATIVE ACTION

Social Security Can Do More to Improve Blacks' Representation in Its Work Force

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GAO

United States
General Accounting Office
Washington, D.C. 20548

Human Resources Division

B-219897

January 2, 1987

The Honorable Parren J. Mitchell
House of Representatives

Dear Mr. Mitchell:

This report, being issued at your request, discusses the effect the affirmative action plan at Social Security Administration (SSA) headquarters has had on the representation of blacks in some of the most populous job series. The report discusses how affirmative action plans are developed and implemented by SSA headquarters components and whether SSA's planning and reporting comply with Equal Employment Opportunity Commission requirements.

The report contains several recommendations to the Secretary of Health and Human Services to direct the SSA Commissioner to bring that agency's affirmative action plans into compliance with Commission requirements and otherwise maximize the effectiveness of SSA's affirmative action efforts.

As arranged with your office, we are sending copies of this report to the Secretary of Health and Human Services; the Director, Office of Management and Budget; the Chairman, Equal Employment Opportunity Commission; the Director, Office of Personnel Management; the SSA Commissioner; and other interested parties and will make copies available to others on request.

Sincerely yours,

Richard L. Fogel

Richard L. Fogel
Assistant Comptroller General

Executive Summary

Purpose

Have the work-force equal employment opportunity (EEO) profiles of blacks in Social Security Administration (SSA) headquarters organizational components improved since the affirmative action program was initiated?

Do SSA affirmative action plans for headquarters employees comply with federal EEO policies?

Has the SSA-wide affirmative action plan been implemented for headquarters employees?

Representative Parren J. Mitchell asked GAO to answer these questions.

Background

The amendments to the Civil Rights Act of 1964 established a policy to eliminate the historical underrepresentation of minorities in the federal work force.

The Equal Employment Opportunity Commission is responsible for enforcing this policy. The Commission promulgated directives that federal organizations are required to follow in developing and implementing affirmative action programs.

The Department of Health and Human Services (HHS) in turn has developed guidance based on the Commission's directives for its major operating components, including SSA, to follow in developing and carrying out affirmative action programs.

In 1982, SSA announced its systems modernization project, and in 1985, SSA said it planned to decrease its nationwide work force by 17,000 as of September 1990. At that time SSA stated that to achieve this staff reduction, few positions would be filled through external hiring and that most changes in work-force EEO profiles would occur through internal movements (promotions and reassignments).

Results in Brief

The overall ratio of blacks employed at SSA headquarters increased from 1982 to 1985. Based on Commission criteria, however, underrepresentation of blacks—especially black men—remains an issue in the SSA components and job series GAO reviewed. While black women are fully represented in most job series through the grade 12 level, they are underrepresented at grades 13 to 15. On the other hand, black men are generally underrepresented at most grade levels.

The affirmative action plans of the components GAO reviewed did not fully comply with Commission affirmative action requirements.

Some elements of SSA's and its components' affirmative action plans have not been implemented. Some of the planned efforts cannot be satisfactorily monitored or evaluated because SSA does not compile and analyze Commission-required data.

SSA and its components have not fully complied with Commission affirmative action requirements. This noncompliance may have contributed to the continued underrepresentation of blacks as of June 1985 in the mainstream job series GAO reviewed.

Principal Findings

SSA's Affirmative Action Plans and Reports Are Not Integrated

For fiscal years 1983-85, more than 100 affirmative action plans and accomplishment reports were prepared annually by SSA and its components. Although Commission and HHS directives state that these plans and related accomplishment reports are to be integrated with the SSA-wide plans and reports, GAO found that elements of the SSA-wide plans and reports could not be tracked to lower levels. Without integrated planning and reporting throughout SSA, all aspects of the SSA-wide affirmative action plan cannot be implemented and, when they are implemented, the results cannot be evaluated.

Noncompliance With EEOC Requirements

SSA and the components GAO reviewed did not fully comply with some Commission affirmative action requirements during fiscal years 1983-85 in that:

- Race and sex profile data were not compiled and analyzed for each stage of the selection process to fill vacant positions. These data are needed for SSA and HHS to identify obstacles to achieving affirmative action goals.
- Either planned studies designed to identify artificial barriers to the advancement of underrepresented groups in the work force were not initiated or the reports have not been issued in final.

In addition, affirmative action efforts involving skills development activities—such as using individual development plans, initiating additional training opportunities, and making job reassignments—to increase advancement potential of minority group members have not been reported on or fully carried out.

Recommendations

To bring SSA and its components into compliance with Equal Employment Opportunity Commission affirmative action program requirements, the Secretary of HHS should direct the SSA Commissioner to

- compile race and sex data on all internal applicants at each stage of the selection process to fill job vacancies and
- identify and act to reduce or eliminate any artificial advancement barriers that adversely affect minority groups.

To maximize the effectiveness of SSA's EEO efforts, HHS should direct SSA to

- integrate the SSA-wide affirmative action plan into SSA components' plans,
- require components to report affirmative action accomplishments with sufficient information to determine whether affirmative action goals and objectives were achieved, and
- report on planned skills development activities designed to aid the mobility of targeted minority group members.

Agency Comments

HHS, in commenting on a draft of this report, agreed with the two recommendations to bring SSA into compliance with Equal Employment Opportunity Commission requirements. HHS also concurred with GAO's recommendation concerning the need for more data on skills development activities, but stated that it would not be feasible to implement this recommendation until the end of fiscal year 1987, when the next SSA multiyear plan is to be developed.

HHS did not agree with GAO's recommendation to integrate the SSA-wide affirmative action plan into SSA components' plans and said that the plans are already integrated. Also, HHS did not agree with GAO's recommendation that SSA components should provide more information in their annual accomplishment reports to determine whether affirmative action goals and objectives were achieved and said that the SSA components already report accomplishments with sufficient information to

make such determinations. GAO continues to believe that these recommendations are valid and should be implemented.

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Abbreviations

ADP	automatic data processing
BQ	best qualified
EEO	equal employment opportunity
EEOC	Equal Employment Opportunity Commission
FTE	full-time equivalent
GAO	General Accounting Office
HHS	Department of Health and Human Services
OCO	Office of Central Operations
OCRO	Office of Central Records Operations
ODO	Office of Disability Operations
OHR	Office of Human Resources
OIS	Office of Information Systems
OPM	Office of Personnel Management
OSI	Office of Systems Integration
OSO	Office of Systems Operations
OSR	Office of Systems Requirements
SSA	Social Security Administration

Introduction

In a May 1, 1985, letter, Representative Parren J. Mitchell expressed concern about alleged disparate treatment of minorities at Social Security Administration (SSA) headquarters in Baltimore. In later discussions, Representative Mitchell asked that we review SSA's affirmative action program[1] for black employees in the Baltimore metropolitan area.

Specifically, we agreed to review SSA's plans to improve black representation and the work-force equal employment opportunity (EEO) profiles in the Office of Central Records Operations (OCRO) and the Office of Disability Operations (ODO), components of the Office of Central Operations (OCO), and the Office of Systems. Systems is one of the few SSA components that in recent years continued recruiting at all grade levels personnel from outside SSA. We agreed to (1) review SSA's implementation of its multiyear affirmative action plans for fiscal years 1982-86 covering headquarters employees in these components and to determine if they comply with federal EEO policies and (2) examine the use of external and internal recruitment strategies in these components to improve black representation within the SSA Baltimore work force.

Social Security Administration

SSA, one of the larger organizational units of the Department of Health and Human Services (HHS), administers a national program of social insurance. SSA programs include Old Age Survivors and Disability Insurance, which provides monthly retirement benefits, and Supplemental Security Income, which provides benefits for the aged, blind, and disabled. SSA headquarters staff provide administrative support, which includes processing disability claims, managing the basic records that support social security programs, and directing the operation of SSA's automatic data processing (ADP) and data communications systems.

The Commissioner of SSA, who reports directly to the Secretary of HHS, has under her direction deputy commissioners, associate commissioners, and regional commissioners (see figure 1.1) to administer social security activities. SSA operations include a headquarters complex with operations in the Baltimore metropolitan area and Arlington, Virginia, and a nationwide field organization of 10 regional offices, 6 program service centers, and over 1,300 local offices.

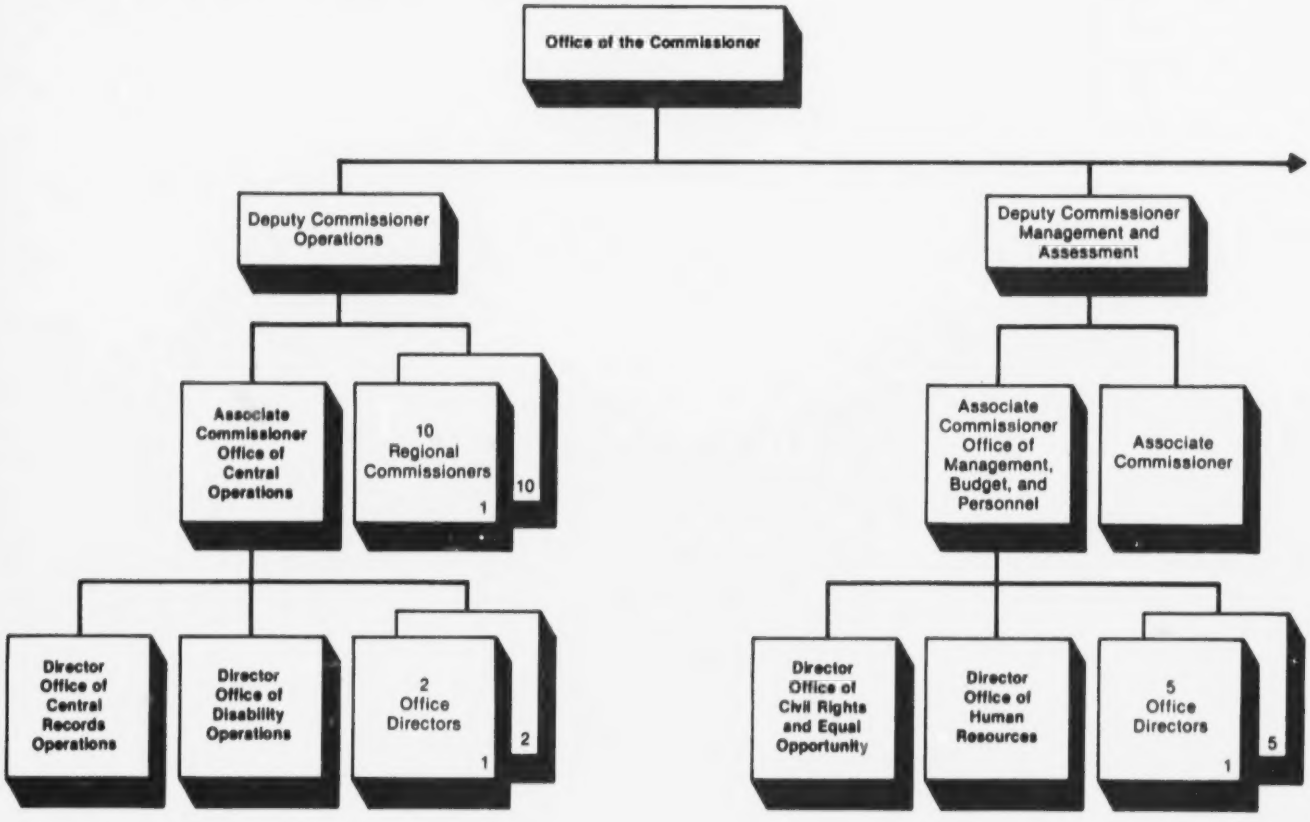
[1] Affirmative action programs are designed to overcome the lingering effects of historical discrimination and to assure equal employment opportunity for (1) white females and (2) both male and female Hispanics, Asian Americans, American Indians, and blacks, hereafter referred to as minority groups.

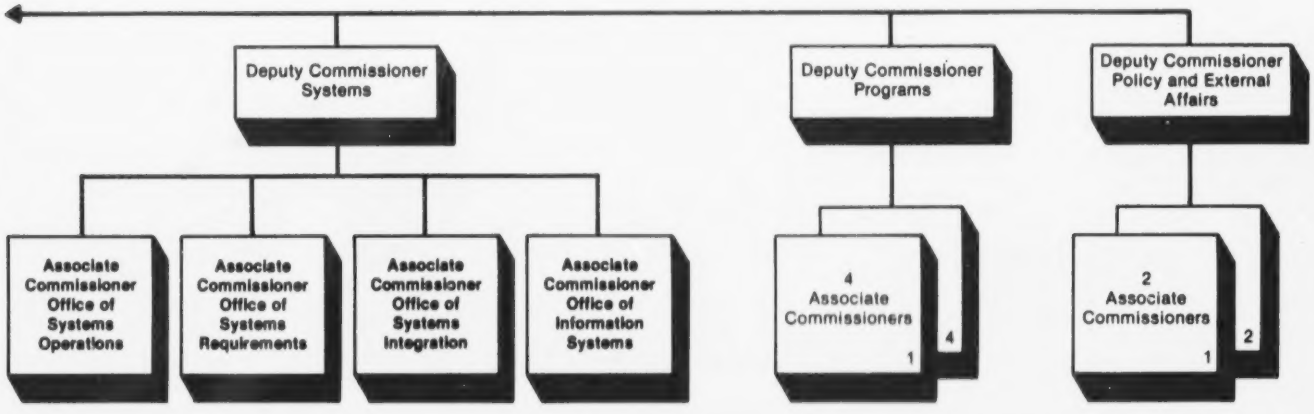
As of June 30, 1985 (the most current data available at the time of our review), SSA employed about 20,000 blacks nationwide—26 percent of its total work force of about 76,000 full- and part-time permanent employees. At that time, SSA headquarters employed about 15,300 employees in the Baltimore area, of whom about 7 percent were black males and 39 percent were black females. OCRO, ODO, and Systems employed about 77 percent of SSA's Baltimore area work force.

According to SSA, most of SSA's Baltimore work force in grades 1 to 15 is employed in relatively few job series. Generally, clerical, secretarial, technical, and entry-level professional positions in grades 1 through 8 are female dominated in SSA. Higher graded technical, professional, and managerial positions historically have been male dominated.

As of June 30, 1985, about 25 percent of the work force were in grade 1-4 technical and clerical positions, and about 33 percent were in grade 5-8 senior clerical, secretarial, technical, and entry-level professional positions. About 31 percent of SSA's personnel were grade 9-12 senior technical and professional employees and first-line supervisors, and about 11 percent were managerial staff at grades 13-15.

Figure 1.1: SSA Line Organizations, December 1986





Notes: Partial organizational structure is shown below the deputy commissioner level—staff offices are not shown. Offices shown in bold blocks were included in our review.

Affirmative Action Programs

Federal government affirmative action programs are intended to overcome the lingering effects of historical discrimination evidenced by the underrepresentation[2] of minorities in specific agencies, regions, positions, and grade levels in federal employment. In 1972, the Congress amended the Civil Rights Act to require federal agencies to maintain affirmative action programs to ensure implementation of EEO policies. The law requires agencies to develop and implement affirmative action programs to carry out this policy. On January 2, 1979, in accordance with Reorganization Plan No.1 of 1978, responsibility for overseeing federal EEO efforts was transferred from the Civil Service Commission, now the Office of Personnel Management (OPM), to the Equal Employment Opportunity Commission (EEOC). This made EEOC the principal agency in fair employment enforcement. EEOC provides affirmative action guidance, monitors the hiring and promotion of minorities, and oversees the government-wide discrimination complaints process.

SSA's Affirmative Action Program

Federal agencies, such as HHS, are required by law, executive order, and regulation to design and implement affirmative action programs. EEOC directed HHS to develop a 5-year affirmative action plan covering fiscal years 1982-86 and to establish a long-term hiring goal and annual hiring goals that should be maintained over the 5-year plan cycle in order to eliminate underrepresentation for each minority group. Annually, EEOC requires HHS to provide an updated plan and accomplishment report. HHS instructions for affirmative action detailed department requirements for SSA-wide plans and reports, which are included in HHS's aggregated plans and reports submitted to EEOC, and directed SSA to provide guidance to subordinate units for developing affirmative action plans and reports.

In August 1983, SSA's Office of Civil Rights and Equal Opportunity (Civil Rights Office) was put under the direction of the Office of Management, Budget, and Personnel. The Civil Rights Office's primary responsibilities, as defined in the HHS/SSA statement of organization, functions, and delegations of authority, include

- directing, coordinating, developing, appraising, and administering SSA-wide programs of civil rights and equal opportunity;

[2]According to EEOC guidance, underrepresentation exists if a specific minority group's rate of employment in a federal agency's work force is less than the group's rate of availability in the civilian labor force.

- providing advice and recommendations to the Office of Management, Budget, and Personnel associate commissioner and SSA executive staff on civil rights and equal opportunity matters; and
- managing the equal opportunity complaints processing system.

SSA's Limited External Hiring

During the 1980's, budgetary constraints, ceiling limitations, and reduced staff turnover have limited SSA's external hiring. In February 1982, SSA announced a plan to gradually reduce employment. In April 1985, SSA estimated that by September 1990 it would reduce its work force by 17,000 full-time equivalent (FTE) positions.[3] SSA based the reduction on efficiencies from planned procedural changes and the modernization of ADP operations.

In recent years, SSA's external hiring has been limited to entry-level clerical and technical positions, "hard to fill" positions, and selected job series. As a result, SSA's affirmative action strategies have focused mainly on internal movement[4] of staff to better balance the representation of minorities among grade levels within mainstream job series (the most populous job series with opportunities for advancement).

Objectives, Scope, and Methodology

To evaluate SSA's affirmative action efforts in fiscal years 1983 to 1985 to improve the work-force EEO profiles of blacks in OCO, OCRO, ODO, and Systems[5] in the Baltimore metropolitan area, we reviewed these components' development of affirmative action plans to support the SSA-wide affirmative action plan and implementation of recruitment strategies to improve the representation of blacks. We also examined the role of the Civil Rights Office in coordinating and monitoring affirmative action planning and reporting in SSA headquarters.

To determine whether OCO, OCRO, ODO, and Systems developed and implemented affirmative action plans to support the SSA-wide plan, we reviewed HHS and SSA guidance for developing affirmative action plans

[3]An FTE position represents 1 work-year of effort expended by SSA staff subject to employment ceilings set by the Office of Management and Budget.

[4]Internal movement involves SSA staff who compete for designated promotions or reassignments to fill vacant positions.

[5]When the SSA-wide multiyear affirmative action plan was developed, there was only one Systems office. Shortly after Systems prepared its multiyear plan, it was realigned into three components—the Office of Systems Requirements (OSR), Office of Systems Integration (OSI), and Office of Systems Operations (OSO). In 1984 an additional operating office—the Office of Information Systems (OIS)—was established.

and traced elements of the SSA-wide plan to the OCO, OCRO, ODO, and Systems plans. We also determined whether the SSA-wide plan and the components' plans complied with major EEOC requirements. We interviewed HHS, EEOC, and SSA's Civil Rights Office officials regarding affirmative action guidance, problems in developing and implementing the plans, and coordination of SSA components' plans with the SSA-wide plan.

We reviewed OCO's, OCRO's, ODO's, and Systems' implementation of stated affirmative action strategies to improve the representation of blacks. We used SSA records of work-force EEO profiles on five mainstream job series (that is, the most populous job series with opportunities for advancement) to compare the rate of black employment as of the base year[6] with the rate of black employment as of June 30, 1985. We identified grade bands within the five mainstream job series where the level of black underrepresentation increased, decreased, or did not change. Using the appropriate affirmative action plan, we identified planned internal and external recruitment strategies to improve black representation. We reviewed records supporting OCO's, OCRO's, ODO's, and Systems' use of recruitment strategies. We discussed with OCO, OCRO, ODO, OIS, and OSO officials their implementation of the recruitment strategies and problems encountered in recruiting blacks.

To determine the SSA Civil Rights Office's role in coordinating and monitoring EEO concerns, we identified the office's authority, responsibilities, and organizational involvement with other parts of SSA. We reviewed the office's mission statement and interviewed the director and other staff members regarding office activities. We also reviewed the office's affirmative action guidance for SSA. In addition, we identified affirmative action and EEO concerns and recommendations that the Civil Rights Office brought to the attention of SSA management.

We included SSA's affirmative action planning from the development of its multiyear (fiscal years 1982-86) affirmative action plan through June 30, 1985. The SSA-wide plan was formally approved on September 13, 1983. SSA's affirmative action planning covers permanent full- and part-time employees in the excepted service, general schedule, and general management positions. Senior Executive Service employees (grades 16 and above) were not included because selections for these positions are made at the department level and SSA's affirmative action plans do not cover employees above grade 15.

[6]Base year data for affirmative action planning were as of June 25, 1982, for OCRO and as of September 30, 1981, for ODO and Systems.

In performing our review, we examined SSA work-force EEO profile records, multiyear affirmative action plans, annual accomplishment reports, annual updated affirmative action plans, and various records of personnel transactions. Our review of the internal selection process was based on analyses of limited available SSA data. While we tested the accuracy of SSA data used in this report where corroborating evidence was readily available, we did not assess the reliability of SSA's work-force EEO profile data or other ADP personnel transaction data because we did not have staff resources available to do so. We did not assess the adequacy of SSA's competitive selection process because this was beyond the scope of our review.

Our March 1986 report[7] identified a broad issue relating to OPM and EEOC requirements for federal agencies to collect specific data for affirmative action programs. This report restates OPM's and EEOC's positions on the collection of the data.

We did our review from September 1985 through June 1986. Except as noted, our work was done in accordance with generally accepted government auditing standards.

[7] Affirmative Action: National Institutes of Health Does Not Fully Meet Federal Requirements (GAO/HRD-86-37, Mar. 5, 1986).

Chapter 2

Blacks' Underrepresentation in SSA Headquarters Remains an Issue

From the implementation of the SSA-wide multiyear affirmative action plan in September 1983 to June 30, 1985, the overall employment rates of blacks within SSA's headquarters work force increased slightly (see p. 19). However, for the five mainstream job series we reviewed, blacks—especially black males—remain underrepresented in some grade bands, according to EEOC's criteria. Generally, black females were fully represented through grade 12, but underrepresented at grades 13 and above in the job series we reviewed. According to the SSA-wide multiyear affirmative action plan, female underrepresentation at the higher grades in SSA's work force is due partly to (1) females' recent entry into the technical/professional series and (2) the few opportunities available to fill vacancies at the higher grade levels.

Black males were generally underrepresented at most grade levels in the job series we reviewed. SSA officials cited the clerical nature of SSA's work and the points of entry into SSA's work force as contributing factors in the underrepresentation of minority men in its work force. Entry into SSA's work force occurs primarily at two points, clerical jobs at grades 2 and 3 and technical/professional jobs at grades 5 and 7. According to SSA, historically, the applicant pool for such positions has been dominated by females—males seldom apply for clerical positions. Entry into technical/professional positions occurs through both internal movement of staff and external hiring. The internal applicant pool draws heavily from SSA's clerical staff, which consists primarily of black females.

Recruitment as an Affirmative Action Strategy

SSA uses external and internal recruitment strategies to increase the number of minorities in the applicant pool for positions where they are underrepresented. As part of its affirmative action plan, SSA is required to estimate vacancies, target underrepresented minority groups for recruitment, and establish measurable hiring/promotion goals.

According to EEOC criteria, underrepresentation exists when a minority group's rate of employment within SSA's work force is less than their rate in the appropriate civilian labor force. For internal recruitment, SSA considers underrepresentation also to exist when a minority group's rate of employment is substantially less at a given grade level when compared to the preceding grade level, regardless of the civilian labor force rates.

SSA's external and internal recruitment strategies are aimed at increasing the rates at which targeted underrepresented minority

groups apply for vacant positions, whereby SSA can increase their rates of employment through hiring and internal movement. SSA's external recruitment strategy includes using the most effective hiring authorities, recruitment sources, and recruitment practices for eliciting applications from members of targeted minority groups. SSA's internal recruitment strategy (1) encourages underrepresented minority group members within SSA to apply for vacant positions, (2) seeks to improve minority groups' ability to compete in the selection process, and (3) requires an analysis of the internal selection process under certain circumstances (see ch. 4).

SSA's affirmative action plans stated that, since the agency's plan to decrease its work force by 17,000 FTEs as of September 1990 will limit external hiring, most changes in work-force EEO profiles will occur through internal movement.

Blacks' Employment Rates in SSA Headquarters

Total SSA employment decreased from 1982 to 1985, including the total number of blacks employed; however, the overall employment rates for black females and black males increased. Also black female and male employment rates within grade bands increased, but SSA headquarters' employment of blacks remains predominately black female. Table 2.1 shows that from June 30, 1982, to June 30, 1985, black female employment rates increased in all grade bands in SSA headquarters. During the same period, black male employment rates increased in all grade bands, except grade band 11-12, where the rate declined. During that period, of the total staff, the overall rates of black females and black males employed at headquarters increased from 36.2 to 39.0 percent and 6.5 to 6.9 percent, respectively.

Table 2.1: Employment Rates for Blacks in All Job Series in SSA Headquarters as of June 30, 1982, and June 30, 1985

Rates in percents

	Number of employees		Employment rates			
			Black females		Black males	
Grades	1982	1985	1982	1985	1982	1985
1-4	4,785	3,801	60.4	62.9	9.0	9.9
5-8	5,717	5,116	43.5	49.6	5.8	6.4
9-10	1,562	1,689	27.2	30.0	5.6	5.9
11-12	3,523	3,142	13.4	15.6	5.5	5.3
13-15	1,957	1,615	3.8	4.5	5.0	5.7
All grades	**17,544**	**15,363**	36.2	39.0	6.5	6.9

Details concerning total employees' and black female and male employment rates of OCRO, ODO, and Systems are shown in appendixes I and II.

Black Representation in Selected Components and Job Series

According to EEOC criteria, blacks remain underrepresented in some grade bands of the five mainstream job series (the most populous job series with opportunities for advancement) in OCRO, ODO, and Systems that we reviewed. As shown in table 2.2, in the five mainstream job series, which had a total of 22 grade bands each for black females and black males, we found that black females and males were fully represented in 18 and 8 grade bands, respectively, in the base year. As of June 30, 1985, the net changes to these levels were slight—black females and males were fully represented in 19 and 8 grade bands, respectively. While the rate of employment for black females increased in two grade bands and the rate for black males increased in four, the level of black female underrepresentation did not increase in any grade band, but the level of black male underrepresentation increased in three bands. Further, there were 10 grade bands—2 for black females and 8 for black males—where the level of underrepresentation did not change.

We judgmentally selected five mainstream job series for review at SSA headquarters: OCRO's administrative and claims clerical series and general clerical series (grades 1 to 13); ODO's social insurance claims examiner series (grades 1 to 14) and mail and file clerk job series (grades 1 to 12); and Systems' computer specialist series (grades 5 to 15). For the base year, employees in the general clerical and administrative job series made up 27 percent of OCRO's work force and those in the claims clerical job series, 35 percent. Staff in the social insurance claims examiner series and the mail and file clerk job series made up 48 and 28 percent, respectively, of ODO's work force. About 47 percent of Systems' work force were employed as computer specialists both at the time the original Systems multiyear plan was developed and as of June 30, 1985. We compared the 1985 computer specialist job series data in aggregate for the current four Systems' offices with the base year data because individual office work-force profiles were not available at SSA in the base year.

We compared the black female and male employment rates at SSA for the five mainstream job series with the appropriate civilian labor force rates and applied the underrepresentation indices identified in a December 9, 1983, memorandum from the HHS Assistant Secretary for Personnel Administration to SSA, to develop the levels of underrepresentation shown in table 2.2. (See app. IV for details of our comparisons.)

Table 2.2: Levels of Underrepresentation for Five Mainstream Job Series by Grade Bands Based on Indices in HHS Memorandum

Component, job series, and grade band	Black females			Black males		
	Base year[a]	1985	Change	Base year[a]	1985	Change
OCRO–claims clerical:						
Grades 1-4	•	•		3	3	
5-8	•	•		3	2	•
9-12	•	•		3	3	
13	1[b]	•	+	•	•	
OCRO–general clerical and administrative:						
Grades 1-4	•	•		•	•	
5-8	•	•		•	2[b]	•
9-10	•	•		•	•	
11-12	•	•		1[b]	1[b]	
13	1[b]	1[b]		1	1	
ODO–social insurance claims examiner:						
Grades 1-4	•	•		•	•	
5-8	•	•		2[b]	4	+
9-10	•	•		2	2[b]	
11-12	•	•		3	3	
13-14	•	•		•	•	
ODO–mail and file clerk:						
Grades 1-4	•	•		•	•	
5-8	•	•		3[b]	4	+
9-10	•	•		1[b]	1[b]	
11-12	•	[c]		1	[c]	
Systems–computer specialist:						
Grades 5-8	•	•		3	•	+
9-10	•	•		3	•	+
11-12	4	•	+	•	4	•
13-15	2[b]	2[b]		3[b]	3	

Legend
•=No underrepresentation
+=level of underrepresentation decreased
•=level of underrepresentation increased

Underrepresentation indices identified in HHS memorandum
1=Severe underrepresentation (0 to 24 percent of civilian labor force)
2=High underrepresentation (25 to 49 percent of civilian labor force)
3=Moderate underrepresentation (50 to 79 percent of civilian labor force)
4=Near parity (80 to 99 percent of civilian labor force)

[a]Base year data were as of June 25, 1982, for OCRO mainstream job series and as of September 30, 1981, for ODO and Systems.

[b]Level of underrepresentation for grade band is at least two levels higher than preceding grade band based on the HHS indices.

[c]Position abolished.

We attempted to obtain details on SSA's use of affirmative action strategies to change work-force EEO profiles in three mainstream job series' grade bands—one each within OCRO, ODO, and Systems. We selected grade bands where (1) the level of black underrepresentation remained unchanged and (2) there appeared to be opportunities to improve the EEO profile because blacks were employed in larger numbers—at least two levels higher than in the preceding grade band based on the HHS indices (see pp. 22-29).

External Recruitment Strategies

Systems' offices have needed additional data processing staff, due largely to the modernization plans of the SSA data processing systems. In February 1981, Systems and the Office of Human Resources (OHR) established a project team to develop recruitment plans to fill Systems' positions, particularly in the computer specialist job series. The Systems multiyear affirmative action plan stated that Systems would work with OHR and the Civil Rights Office to identify qualified minority candidates for the computer specialist series. The plan provided that most computer specialist positions would be filled through external hiring.

Since the base year, the overall employment rates have increased for black females and males in most grade bands of the computer specialist job series (for details, see app. IV). In the base year, the overall employment rates for black females and males in Systems—3.9 percent and 4.6 percent, respectively—were less than their employment rates in the national civilian labor force. (Systems recruits nationwide for all positions and grades in the computer specialist job series; therefore, it uses the national civilian labor force statistics to determine underrepresentation at all grades.) As of June 30, 1985, the overall employment rates of black females and males had increased to 5.6 and 5.0 percent, respectively; and both exceeded the national civilian labor force rates at that date.

Although the overall employment rates of black females and males in the computer specialist job series increased, both groups remained underrepresented in some grade bands (see table 2.2). Based on the indices of underrepresentation identified in the HHS memorandum, black

females were highly underrepresented in grade band 13-15, and black males were near parity and at moderate underrepresentation in grade bands 11-12 and 13-15, respectively.

The original Systems affirmative action plan covering fiscal years 1982-86, as well as the multiyear plans of OSI, OSO, and OIS, targeted black females and males in the computer specialist job series at grades 13 through 15 for external recruitment. The deputy to the deputy commissioner for Systems told us that Systems does not have any specific strategies to recruit blacks for grade 13 through 15 positions. According to that official and executive officers of OSI and OSO, the problems in recruiting computer specialists at grades 13 through 15 are not unique to blacks, but are also problems experienced with recruiting other minority groups. The OSO executive officer said that the potential applicants for the computer specialist series are predominately white males because minority colleges have lagged in offering computer science courses.

OHR did not have records available for us to evaluate the external recruitment sources for computer specialist positions. The deputy director, OHR, gave us a list identifying job fairs, special interest groups, employment agencies, minority colleges, and public announcements, among others, as external recruitment sources for the computer specialist positions. She said, however, that OHR does not maintain data for computer specialist vacancies by recruitment source. The deputy to the deputy commissioner for Systems and executive officers of OSI and OSO said that their offices have not analyzed the results of their recruitment activities for computer specialist grade 13 through 15 positions.

Internal Promotions and Reassignments

OCRO and ODO relied on internal promotions and reassignments to change the levels of black male representation in the general clerical and administrative grade band 11-12 and the social insurance claims examiner grade band 9-10, respectively. Systems also relied on internal promotions and reassignments to change the level of black female representation in computer specialist positions at grade band 13-15.

As discussed more fully on pages 41 and 42, SSA's internal selection process includes the following five stages:

1. The potential applicant pool, consisting of employees within the area of consideration.[1]

2. Actual applicants for vacancies.

3. Qualified applicants or those actual applicants who meet certain minimum requirements.

4. Best qualified candidates or the applicants ranked highest based on numerical scores.

5. Persons selected to fill vacancies.

The SSA-wide guidance prepared by the Civil Rights Office stated that applicant flow data (i.e., information on the race and sex of all applicants) for each stage of the internal selection process would be compiled.

ODO's Internal Selections

ODO's multiyear affirmative action plan targeted black males for internal recruitment for the social insurance claims examiner grade band 9-10. Black male employment at grade 8 (the grade level of the potential applicant pool) increased from 26 (4.6 percent) of 565 persons during the base year to 67 (8.5 percent) of 785 persons as of June 30, 1985. As of the latter date, the opportunities to improve the level of black male underrepresentation at grade band 9-10 appeared to have increased because, according to the indices in the HHS memorandum, the black male employment rate for grade band 5-8 was two levels higher than their employment rate at grade band 9-10.

As shown in table 2.3, ODO officials selected 20 of 26 black males who were included among the best qualified candidates for social insurance claims examiner grade 9 vacancies. Available data for 16 announcements involving 439 promotion/reassignment opportunities to grade 9 in three occupations in this mainstream job series are summarized in the table.

[1]The area of consideration includes employees in the SSA offices/geographic areas from which SSA will accept applications for vacancies.

Table 2.3: ODO Vacancy Announcements for Social Insurance Claims Examiner Grade 9 Positions

Position	Date of announcement	Ratio of black males to total BQ[a] Candidates	Selectees	Percent of black males selected to black male BQ candidates
Claims authorizer				
	6–29–81	0/82	0/28	•
	6–07–82	4/107	3/40	75.0
	12–12–83	1/34	0/13	0
	2–15–85	2/144	2/54	100.0
Recovery reviewer				
	2-15-82	8/119	7/39	87.5
	6–21–82	1/52	0/19	0
	11–08–82	2/122	2/41	100.0
	5–16–83	0/37	0/16	•
	12–12–83	1/61	1/35	100.0
	6–17–85	1/72	0/43	0
Benefit authorizer technical assistant				
	11-08-82	2/122	2/41	100.0
	5–16–83	1/51	1/22	100.0
	12–19–83	3/69	2/28	66.7
	7–23–84	0/25	0/6	•
	12–10–84	0/9	0/1	•
	6–17–85	0/41	0/13	•
Totals		**26/1,147**	**20/439**	

[a]Best qualified candidates to fill vacant positions.

These limited data show that ODO selecting officials selected 77 percent (20 of 26) of the black males who made the best qualified list of candidates to fill vacancies, while they selected 37 percent (419 of 1,121) of all other best qualified candidates. These data also show that black males made up 2.3 percent (26 of 1,147) of the best qualified candidates; however, they were selected to fill 4.6 percent (20 of 439) of the vacancies. For these positions then, ODO officials took advantage of the opportunities to promote/reassign black males to these vacancies. Without information on the number of eligible black male applicants for these positions, we could not compare the rate at which eligible black males applied for these positions to their rate of selection.

ODO officials said they are continually aware of the positions in which black males are underrepresented and that selecting officials usually choose black males to fill such positions when they are among the best qualified candidates. The officials expressed concern about the number of black males that have been included among the best qualified candidates to fill social insurance claims examiner grade 9 vacancies. They added, however, that ODO has not analyzed the competitive selection

process to identify factors that may hinder black males; that is, to identify disparities in the various stages—application, determining qualified applicants, determining best qualified candidates, and selection.

OCRO's Internal Selections

OCRO's multiyear affirmative action plan targeted black males for internal recruitment for the general clerical and administrative job series grade 12. As of June 30, 1985, three of the eight persons (37.5 percent) in grade 10 positions in the general clerical and administrative job series in OCRO were black males. Black males were fully represented in grade band 9-10 as of the base year to June 30, 1985.

During the same period, the number of positions in OCRO's general clerical and administrative grade band 11-12 increased from 7 to 19, but no black males were selected for these positions. OCRO data showed that black males have been among the best qualified candidates to fill some of the vacant general clerical and administrative positions, but none have been selected. These data are shown in table 2.4.

Table 2.4: OCRO Vacancy Announcements for General Clerical and Administrative Grade 11 and 12 Positions

Position	Date of announcement	Ratio of black male BQ candidates to total BQ candidates
Audit and coverage supervisor:		
Grade 11	2–05–82	0/9
	3–25–83	4/15
Title staff assistant:		
Grade 11	5–07–82	4/14
Grade 12	7–09–82	1/7
Deputy SSI[a] operations branch chief:		
Grade 12	5–28–82	0/15

[a]Supplemental Security Income

OCRO did not select black males to fill grade 11 and 12 vacancies in the general clerical and administrative job series. On June 25, 1982, OCRO's seven positions in the 11-12 grade band were held by white males, white females, and black females. The EEO profile as of June 30, 1985, for the 19 grade 11 and 12 positions reflected increases for black females, white females, and white males.

OCRO has not improved black male underrepresentation in the general clerical and administrative grade 11 and 12 positions although black males were on the best qualified lists of candidates for three of the five

vacancy announcements we reviewed. Black males did not occupy any of these positions as of the base year or as of June 30, 1985. The OCRO deputy director stated that although no black males have been selected for the general clerical and administrative grade band 11-12 positions we reviewed, black males hold positions in this grade band in other mainstream job series within OCRO.

As in ODO, because applicants' race and sex data are not collected at each stage of the selection process, we could not compare the EEO profiles for selections with the EEO profiles at the other stages of the selection process.

Systems' Internal Selections

Nine black females who applied for grade 13 computer specialist vacancies in 1984 and 1985 that we examined in OIS, OSO, and OSI were among the best qualified candidates. We did not identify any OSR vacancy announcements for this job series. The original Systems and OIS, OSO, and OSI multiyear affirmative plans targeted black females for internal recruitment for grade 13 computer specialist positions.

As shown in table 2.5, in reviewing 25 vacancy announcements for OIS, OSO, and OSI grade 13 computer specialist positions in 1984 and 1985, we found that 55 of the 1,132 applicants (4.9 percent) were black females. Of the 324 best qualified candidates for the vacant positions, 9 (2.8 percent) were black females. Of the 39 selected to fill a vacant position through promotion or reassignment, 1 was a black female (2.6 percent).

Table 2.5: Systems Vacancy Announcements for Computer Specialist Grade 13 Positions

Office and position	Date of announcement	Ratio of black female applicants to total applicants	Ratio of black female BQ candidates to total BQ candidates	Number of persons selected
OIS:				
Computer systems analysts				
	11–12–84	1/55	0/16	3
	12–24–84	2/52	0/9	1
Supervisory computer systems analysts				
	3–18–85	1/76	0/15	1
OIS total		**4/183**	**0/40**	**5**
OSO:				
Computer systems programmer				
	4–23–84	0/13	0/11	1
	5–20–85	0/9	0/9	1
Supervisory computer systems programmer				
	5–27–85	1/24	0/15	1
Supervisory computer specialist				
	1–28–85	6/62	0/18	2
Computer systems analysts				
	3–04–85	2/39	0/10	3
	7–15–85	0/28	0/6	1
Computer equipment analysts				
	7–22–85	3/30	0/8	1
	6–17–85	2/28	0/8	3
OSO total		**14/233**	**0/85**	**13**
OSI:				
Computer systems analysts				
	2–06–84	0/32	0/10	2
	5–14–84	2/65	0/8	1
	6–18–84	3/42	1/8	1
	8–06–84	5/66	2/40	6[b]
	3–04–85	2/40	2/18	1
	3–11–85	3/53	0/8	1
	3–11–85	5/72	1/9	1
	3–18–85	4/78	1/15	1
	3–18–85	4/86	1/13	1
	7–22–85	2/29	0/8	1
Supervisory computer systems analysts				
	6–11–84	3/43	0/16	2
	5–27–85	1/34	0/16	1

Office and position	Date of announcement	Ratio of black female: Applicants to total applicants	Ratio of black female: BQ candidates to total BQ candidates	Number of persons selected
	5–27–85	2/47	1/15	1
	6–10–85	1/29	0/15	1
OSI total		**37/716**	**9/199**	**21**
Grand totals		**55/1132**	**9/324**	**39**

[a]Includes all applicants—some of whom may have been ineligible to fill the position because they did not meet OPM's minimum qualification requirements.

[b]One of these six was a black female.

Because race and sex data were not collected regarding the potential applicant pool and qualified applicants, we could not compare the EEO profile for selections with the EEO profile at other stages of the selection process.

Conclusions

ODO, OCRO, and the Systems offices varied in their use of the internal selection process to increase black representation.

Based on our limited review of readily available SSA data concerning the internal selection process, we noted that:

- OCRO did not select any black males for vacant positions.
- ODO generally selected black males for vacant positions when they made the best qualified list; however, because SSA does not compile applicant flow data, we were not able to determine whether the ratio of black males who applied for the vacancies we examined was commensurate with the ratio of qualified black males in the potential applicant pool.
- The three Systems offices' selection rates for black females who applied for computer specialist vacancies were lower than the ratios of black females who made the best qualified lists, and these best qualified ratios were lower than the ratios of black females who applied for the vacancies.

As discussed in chapter 4, without compiling and analyzing applicants' race and sex data at each stage of the selection process—applicants, qualified applicants, best qualified candidates, and selectees—SSA cannot determine whether its policies, procedures, and practices act as artificial barriers for minority groups. Absent barrier identification, SSA cannot focus its revised affirmative action strategies on those barriers that most hinder the improvement of the representation of targeted minority groups within mainstream job series grade bands.

The SSA-Wide Affirmative Action Plan Has Not Been Fully Implemented

The SSA-wide affirmative action plan has not been fully implemented because some of the plan's elements are not fully integrated into components' affirmative action plans. Specifically, we found that

- the SSA-wide plan targeted job series for affirmative action efforts, but some components' plans did not similarly target these job series even though they had employees in them, and
- annual hiring goals established in the SSA-wide plan were not integrated into components' plans.

Also, components' accomplishment reports did not include sufficient information to measure whether SSA's affirmative action plan goals and objectives were met.

If SSA components' affirmative action planning and reporting activities were integrated with the SSA-wide planning and reporting, SSA could better direct its efforts to improve work-force EEO profiles and evaluate components' efforts to improve minority underrepresentation.

Integrating Affirmative Action Planning

The SSA-wide affirmative action plan has not been fully integrated into components' plans. EEOC Management Directive 707 required agencies to develop and implement multiyear affirmative action plans to ensure responsibility commensurate with delegations of authority within the agency. HHS Circular 1608-1/720-2, dated March 29, 1982, provided guidance to SSA for developing an SSA-wide plan for the aggregated HHS plan, which is submitted annually to EEOC. According to HHS guidance, the SSA-wide plan is a general plan that establishes a guide to priorities, policies, and strategies for SSA and its components. HHS holds the SSA Commissioner responsible for guiding components in developing complete and supplemental plans that fully integrate the essential details of the SSA-wide plan and requires the Commissioner to hold subordinate managers responsible for addressing the correction of underrepresentation.

Affirmative action plans are to include information on the following: work-force EEO profiles, determinations of underrepresentation, hiring/promotion goals for underrepresented groups, and methods of monitoring progress toward improving minority groups' representation. Affirmative action plans at the SSA-wide level and for the major SSA components also are to include a Federal Equal Opportunity Recruitment Program plan and plans for analyzing personnel policies, procedures,

and practices—barrier analyses—that may impede progress toward meeting affirmative action goals.

Recruitment Program plans complement affirmative action plans by identifying recruitment strategies to increase the representation of minority group members in applicant pools for positions where they are underrepresented. Recruitment Program plans identify underrepresented minority groups targeted for internal and external recruitment, establish external recruitment programs aimed at reaching underrepresented group members, and detail skills assessment and development activities to give minority groups within the agency's work force opportunities to move into positions where they are underrepresented.

SSA's Affirmative Action Planning

In May 1982, the Civil Rights Office issued SSA's guidance to components for preparing multiyear affirmative action plans. According to SSA guidance, the Commissioner has ultimate responsibility for affirmative action. Planning, implementing, and monitoring are delegated to the components following SSA's organizational structure and lines of authority. SSA's affirmative action planning process includes three organizational levels of plan development: the overall SSA-wide plan at the Commissioner level, complete plans prepared by major SSA components, and supplemental plans prepared by the other components.

SSA's Delegations of Responsibility

The Commissioner (first-level planning) delegated to associate commissioners (second-level planning)—including OCO and Systems—responsibility for developing, implementing, and monitoring their own affirmative action plans. SSA guidance did not assign responsibility below the associate commissioner level, but subordinate managers, such as the directors of OCRO and ODO, are required to develop and implement affirmative action plans (third-level planning), and SSA includes EEO performance standards as an element of their performance plans.

SSA's Plan Development

In addition to the SSA-wide plan, over 100 other affirmative action plans, including complete plans and supplemental plans, are prepared annually. The associate commissioner, OCO, was required to prepare a complete plan aggregating the supplemental plans of its components including OCRO and ODO. The associate commissioner, Systems, prepared a supplemental plan.

Originally Systems had one multiyear affirmative action plan under the responsibility of one associate commissioner. Currently four associate commissioners are responsible for the respective plans of OSR, OSI, OIS, and OSO. In 1982, SSA announced an interim reorganization to realign Systems into three operating offices—OSR, OSI, and OSO—and in 1984 an additional operating office, OIS, was formed. After the realignment, each of the four operating Systems offices developed supplemental multiyear affirmative action plans covering the remaining period of the original Systems multiyear plan. The OSR, OSI, OSO, and OIS plans covered fiscal years 1984-86. The four Systems offices' plans were not consolidated into a single Systems-wide affirmative action plan.

SSA-Wide Affirmative Action Plan Not Fully Integrated Into Lower Level Plans

The SSA-wide affirmative action plan has not been fully implemented because some of its elements have not been fully integrated into lower level plans. For example, OCO's and the four Systems' plans were prepared independently of the SSA-wide plan. We found that level two and level three affirmative action plans did not target the mainstream job series identified in the SSA-wide affirmative action plan, nor did these components report measurable accomplishments on these mainstream job series. Moreover, SSA-wide promotion/hiring goals were not integrated in level two and level three affirmative action plans.

Mainstream Job Series

In developing its multiyear affirmative action plan, the SSA Office of Civil Rights identified the mainstream job series, based on EEOC criteria, on which SSA would focus affirmative action strategies and efforts for the duration of the plan. Mainstream job series are the most populous job series in which opportunities for improving the EEO work-force profile are probable. Job series not identified as mainstream are combined into an "all other" category for affirmative action planning and reporting purposes.

After identifying the mainstream job series, the SSA Civil Rights Office identified, by grade band, minority underrepresentation within each mainstream job series. The SSA-wide multiyear plan identified seven mainstream job series for separate reporting of affirmative action and included a list identifying the SSA components having employees in these series. The 1984 SSA-wide updated plan identified 8 additional mainstream job series, increasing to 15 the number of series identified for separate reporting. The entire list of 15 mainstream job series included over 90 percent of the total SSA work force during 1984.

SSA components that had employees in the mainstream job series identified by the Civil Rights Office in the SSA-wide plan, however, were not directed by SSA guidance to address these seven job series as mainstream job series in their multiyear affirmative action plans. As a result, each component preparing a multiyear plan decided the mainstream job series that would be the focus of affirmative action. SSA also did not direct the components to include the eight additional mainstream job series in their updated plans.

Accordingly, the mainstream job series addressed in both the SSA-wide multi-year and updated fiscal year 1984 plans were not addressed in the plans of some components having employees in these series. The components' plans we reviewed sometimes addressed these job series in an "all other" category or did not address them at all. Some SSA components with significant numbers of employees in SSA-wide mainstream job series did not address these series as mainstream in their affirmative action plans. For example, as of July 1986:

- OCO employed 1,223 of the 2,460 SSA-wide staff in the miscellaneous clerk and assistant job series, but did not address this as a mainstream job series or in the "all other" category in its multiyear plan.
- ODO employed 216 of the 1,550 SSA-wide staff in the clerk typist job series, but addressed this series in an "all other" category in its multiyear plan.

When components employ large numbers of employees in SSA-wide mainstream job series, they should address these series as mainstream and direct their efforts to improve the EEO work-force profiles for these series. We also noted that some components employed over 100 staff in some of the SSA-wide mainstream job series, such as in the clerical positions, but have not addressed these job series as mainstream. Because improvements in the EEO work-force profiles in the SSA-wide mainstream job series depend on the components' efforts, components employing significant numbers of employees in these mainstream job series should address them as such.

Many inconsistencies existed among the SSA-wide mainstream job series and those addressed as mainstream in the components' affirmative action plans as of July 1986. Table 3.1 shows the extent of these inconsistencies. (See app. V for details on these mainstream job series.)

Table 3.1: Summary of SSA-Wide Mainstream Job Series Addressed in Components' Affirmative Action Plans

	SSA-wide mainstream job series			
SSA components	Should have been addressed separately	Addressed separately	Included in "all other" category	Not addressed
OCO	13	5	•	8
OCRO	11	3	7	1
ODO	12	4	3	5
OSI	9	2	•	7
OSR	8	2	•	6
OSO	8	1	•	7
OIS	7	1	•	6

Hiring/Promotion Goals

Contrary to EEOC requirements, HHS did not require SSA's and its components' multiyear plans to include hiring/promotion goals. But, beginning in fiscal year 1984, the SSA-wide updated plans and components' updated plans were required to include numerical hiring goals. Although SSA formulated hiring/promotion goals beginning in fiscal year 1984, these goals were not integrated among organizational levels.

EEOC Management Directive 707, effective January 1981, required agencies to set numerical hiring/promotion goals by race and sex. The goals were to consist of (1) long-term hiring/promotion goals covering fiscal years 1982-86 for underrepresented groups[1] and (2) annual hiring/promotion goals so that underrepresented groups achieved full representation by the end of the 5-year planning cycle. The directives required the establishment of goals based on available opportunities—including new hires, promotions, and reassignments.

HHS guidance issued in 1982 did not require components to establish hiring/promotion goals in their multiyear plans. A December 9, 1983, memorandum from the HHS assistant secretary for personnel administration to SSA and other HHS organizational units, however, stated that beginning in fiscal year 1984, affirmative action plans must include hiring/promotion goals when (1) underrepresentation exists and (2) opportunities to hire, promote, or reassign staff were expected to occur.

SSA did not prepare written guidance regarding hiring/promotion goals. The Civil Rights Office developed such goals for the SSA-wide updated plans and for the SSA components' updated plans. An EEO specialist from

[1]The SSA-wide and SSA components' affirmative action plans did not include long-term goals.

the Civil Rights Office who was involved in developing these goals told us that the SSA-wide goals were not integrated into the components' plans.

SSA Components' Accomplishment Reports Do Not Include Information Needed to Evaluate Efforts

SSA components' annual reporting of affirmative action accomplishments does not provide enough information to determine whether the components have used available opportunities to improve EEO work-force profiles. In other words, these accomplishment reports do not compare planned goals and projections with actual performance. Specifically, components' annual accomplishment reports do not compare

- projected vacancies with hiring/promotion opportunities and
- hiring/promotion goals with the EEO profile of those selected to fill the positions.

In a December 9, 1983, memorandum, the HHS assistant secretary for personnel administration instructed SSA to report affirmative action accomplishments on EEOC forms 508 (hiring goal accomplishments) and 509 (internal movement goal accomplishments), among other forms. These forms allow comparisons of actual hiring, promotion, and reassignment accomplishments with projected external hiring and internal promotion/reassignment opportunities. The HHS memorandum did not specify which reporting units would use these forms for reporting.

We reviewed the 1983, 1984, and 1985 accomplishment reports for the SSA-wide, OCO, OCRO, ODO, OSI, OSR, OSO, and OIS plans[2] . The Civil Rights Office prepared the accomplishment reports for the SSA-wide plan and compiled the data for OCO, OSI, OSR, OSO, and OIS (level two planning) to use in developing their accomplishment reports. The SSA-wide fiscal year 1984 and 1985 accomplishment reports prepared by the Civil Rights Office included the required EEOC forms 508 and 509. The accomplishment reports for OCO, OSI, OSR, OSO, and OIS did not include the forms or the information required by EEOC.

The data provided by the Civil Rights Office for use by the components to analyze accomplishments consisted primarily of the components' work-force EEO profiles. These data only compared a current period's and a preceding period's ending work-force EEO profiles to show changes

[2]The SSA-wide and most SSA components' first accomplishment reports covered fiscal year 1983. A fiscal year 1983 accomplishment report was not prepared for Systems. Following the realignment, the first accomplishment reports for OSI, OSR, and OSO covered fiscal year 1984 and OIS's first accomplishment report covered fiscal year 1985.

from one year to the next. Although this "bottom line" information was useful in showing changes in the employment rates of minority groups in various mainstream job series and grade bands, it was not sufficient to determine the extent to which the components had used the opportunities to improve EEO work-force profiles where underrepresentation existed. Other data related to various personnel transactions were also generated by the Civil Rights Office, but we could not link these data with the strategies outlined in the affirmative action plans.

The SSA components do not analyze and track opportunities in the same manner. We reviewed updated affirmative action plans/accomplishment reports for fiscal years 1984, 1985, and 1986 prepared by the seven SSA components and found that only OSO and OIS included comparisons of their projected opportunities to improve EEO work-force profiles with their hiring, promotion, and reassignment selections to supplement the data prepared by the Civil Rights Office. For example, for the computer specialist mainstream job series

- OSO identified its goals for minority groups and compared them with the actual selections for fiscal years 1984 and 1985, and
- OIS compared fiscal year 1985 actual opportunities with projected vacancies and identified the EEO profile of selections.

SSA components should report affirmative action accomplishments in a manner similar to the SSA-wide report to provide information to evaluate EEO performance. Such reporting should, as a minimum, include comparisons of projected hiring, promotion, and reassignment opportunities with actual opportunities and comparisons of the race and sex of those hired, promoted, and reassigned with planned goals for minority groups. Such comparisons are needed to evaluate components' affirmative action performance to improve work-force EEO profiles.

Conclusions

The SSA-wide affirmative action plan has not been fully implemented because lower level plans do not address the same mainstream job series. The SSA-wide hiring/promotion goals are not integrated into components' affirmative action plans. In addition, components' annual accomplishment reports do not include enough information to assess the extent to which components have used opportunities to improve minority underrepresentation where it exists.

Recommendations

We recommend that the Secretary of HHS direct the Commissioner of SSA to

- integrate the SSA-wide affirmative action plan into components' plans, especially in regard to identifying mainstream job series and establishing hiring, promotion, and reassignment goals, and
- require components to report affirmative action accomplishments with sufficient information to determine whether affirmative action goals and objectives were achieved.

Agency Comments

In commenting on our recommendation that the Secretary direct the Commissioner to integrate the SSA-wide affirmative action plans and reports into components' plans and reports, HHS said that the plans are already integrated, but provided no evidence to support this contention. HHS also stated that SSA is attaining better results than if it strictly adhered to EEOC and HHS guidelines because 23 mainstream job series had been established at SSA, rather than only the 7 required by EEOC. HHS also stated that to see the relationship of the SSA-wide plan with its components' plans, one must examine all components' plans, not just a sample.

We stand by our recommendation because, to be fully integrated, the same overall goals and objectives and plans for action at the SSA-wide level must cascade down to the SSA components. We did not find this to be the case in our review of the multiyear affirmative action plans and annual updated plans and accomplishment reports for SSA overall and its headquarters components. Furthermore, in reporting on affirmative action accomplishments, the SSA headquarters components' data were not fully compatible with the data reported SSA-wide.

We agree that SSA's decisions to establish 23 mainstream job series and target 15 of them in its updated SSA-wide affirmative plan beginning in fiscal year 1984 were appropriate, rather than limiting the number of targeted job series to 7. Large agencies like SSA, however, were advised by EEOC guidelines to target up to 15 job series in their plans.

We also agree that, in their affirmative action plans, SSA components should have the flexibility to focus on job series that warrant attention, in addition to the mainstream job series targeted in the SSA-wide plan. We believe, however, that additional job series should be identified and targeted within the context of an overall plan that effectively recognizes SSA-wide priorities.

As discussed on page 32 of this report, the 15 mainstream job series identified in the SSA-wide plan included over 90 percent of the SSA work force. As shown on page 34, of the seven SSA headquarters components we reviewed, only OCO's plan separately addressed as many as five of the mainstream job series targeted in the SSA-wide plan, even though each of the seven components should have addressed from 7 to 13 of the SSA-wide series. Also as shown on page 34, only OCRO and ODO exercised the option to include any of the SSA-wide mainstream job series in the "all other" category of their plans. As evidenced by these data, the SSA headquarters components we reviewed had not developed plans to overcome underrepresentation in many of the mainstream job series targeted in the SSA-wide affirmative action plan, and that is why we continue to believe that an integrated plan is needed. Furthermore, SSA has not provided evidence to support its assertion that its local-option approach is achieving better results than it might have achieved with a more integrated focus on the 15 key job series.

While we did not review all of the SSA headquarters components' affirmative action plans, we were advised during our review by SSA Civil Rights Office officials that the affirmative action plans, decisions, and data relating to the components we reviewed were typical of the other SSA headquarters components.

HHS disagreed with our recommendation that SSA components should be required to report affirmative action accomplishments with sufficient information to determine the extent to which affirmative action goals and objectives are achieved. HHS cited the fact that a variety of tables and data are developed periodically at SSA concerning a variety of personnel actions and stated that we may not have examined these data in developing our conclusions and recommendations.

During our review we examined all of the data cited in HHS's response. The data referred to are generated by the SSA Civil Rights Office and OHR—not the SSA components. In some cases, these data were identified as being the annual accomplishment reports of the components, and no supplemental data, narratives, or explanations were developed by the components' staffs. In most components no direct information was provided concerning whether stated goals and objectives were achieved. Also, we could not readily link the accomplishment reports' data with the strategies discussed in the components' multiyear and updated affirmative action plans. The annual accomplishment reports are to be used by SSA headquarters components in adjusting the annual updated

affirmative action plans; however, we did not find that this occurred in the components we reviewed.

Finally, as discussed in chapter 4, without compiling and analyzing complete race and sex profile data, SSA and its components cannot provide data in their accomplishment reports on the extent to which they used available opportunities to hire, promote, and reassign black males and black females to targeted positions. Without reporting fully on the data involving these opportunities, SSA's accomplishment reports will continue to be inadequate.

SSA Headquarters Affirmative Action Program Does Not Fully Comply With All EEOC Requirements

SSA headquarters components are not fully complying with all EEOC affirmative action program requirements designed to improve the representation of minorities in the federal work force. Specifically:

- Applicants' race and sex profile data for each stage of the selection process are needed to monitor and evaluate affirmative action efforts, but they are not compiled and analyzed.
- Studies to identify barriers to achieving full representation of minorities in the work force have not been initiated or reports remain incomplete.

Correcting this noncompliance is necessary so that SSA will be able to evaluate its affirmative action efforts to improve the representation of targeted minority groups, including black males and females, as discussed in chapter 2.

Also the effect of planned skills development activities (training, job reassignments, individual development plans) on SSA's work-force EEO profiles for the components we reviewed could not be determined because the reporting on these activities is incomplete or lacking.

Applicants' Race and Sex Data Not Compiled

SSA does not compile data on the race and sex of persons applying for vacant positions for each stage in the selection process; that is, applicant flow data are not compiled from the first stage of application through the last stage of selection to fill the vacancy. Since developing multiyear affirmative action plans in 1983, SSA had not compiled applicant flow data on applicants from within the agency, and in 1985, SSA discontinued collecting the data on applicants from outside the agency.

EEOC Management Directive 707, effective January 1981, provides that the collection of applicant flow data is critical in identifying barriers to full employment of underrepresented groups and monitoring the effectiveness of internal and external recruitment efforts. The EEOC directive requires the collection of race and sex data at each stage of the selection process. The collection of these data is also required by the Uniform Guidelines on Employee Selection Procedures, which became effective on September 25, 1978. These guidelines provide systematic procedures to identify employment practices that indicate disparate impact in regard to race, sex, or ethnic origin.

HHS guidance requires the collection of applicant flow data. HHS Circular 1608-1/720-2, dated March 29, 1982, stated that subordinate agencies—such as SSA—should begin to collect applicant flow data in fiscal year

1982 in anticipation that detailed analyses would be required in later years.

Complete Internal Applicant Race and Sex Data Not Compiled

The SSA-wide multiyear affirmative action plan stated that components would analyze the race and sex data of internal job applicants[1] to identify possible artificial barriers to the internal selection of underrepresented groups in targeted positions. An agency's policies, practices, and procedures governing the internal selection process may impose artificial barriers if such policies, practices, and procedures cannot be validated as being related to the job. Analyzing these data would reveal whether disparate selection rates were occurring for underrepresented groups. If disparate selection rates were found, SSA was to undertake further analysis to identify specific policies, procedures, and practices that acted as barriers at any stage of the selection process, including (1) applying for vacancies, (2) being determined to be among the best qualified candidates, and (3) being selected to fill vacancies.

SSA has two competitive selection processes—one for positions involving labor bargaining units and another for other positions. Applications under both processes go through the stages described below. Both processes use several weighted factors to score and rank applicants. Applicants receive scores for related work experience, performance appraisals, and other factors, such as awards, relevant training, education, and test scores.

Selecting officials choose persons to fill vacancies from among the list of best qualified candidates. For a single vacancy, the highest ranking applicants plus those tied for the "cutoff" score make up the list of best qualified candidates. When a vacancy announcement includes more than one open position, additional candidates are included on the best qualified list.

The SSA-wide plan stated that OHR would maintain data organized by race and sex for each stage of the competitive selection process as follows:

- The potential applicant pool (all persons within the area of consideration).
- Actual applicants for vacancies.

[1]Persons employed by SSA must compete to be selected for designated reassignments or promotions.

- Qualified applicants.[2]
- Best qualified candidates.
- Persons selected to fill vacancies.

SSA does not compile race and sex data for all stages of the competitive selection process. While SSA compiles the race and sex profile of persons in the potential applicant pool and actual applicants for vacancies, it does not compile the race and sex profile for qualified applicants, nor does it routinely compile race and sex profiles of best qualified candidates and persons selected to fill vacancies.

As an example that SSA does not routinely compile these data, we requested from the Civil Rights Office the race and sex profiles of persons included on the best qualified lists of candidates and those selected for 97 vacancy announcements for OCRO, ODO, and Systems positions. However, the Civil Rights Office was only able to provide race and sex profiles of the best qualified candidates for 43 of the 97 vacancy announcements and the profiles of persons selected for 38 of the 43 vacancy announcements. Officials from OHR and the Civil Rights Office acknowledged that their offices do not compile race and sex data for each stage of the selection process as required by EEOC Management Directive 707.

The Civil Rights Office maintains race and sex files on individual employees, and OHR maintains data on employees who apply, qualify, are among the best qualified candidates, and are selected for each announced vacancy. However, OHR data and the Civil Rights office files are not (1) combined to produce the race and sex profile of qualified applicants and (2) routinely compiled to produce the race and sex profiles for the last three stages in the selection process. The deputy chief, Recruitment and Placement Branch, OHR, told us that the data that OHR maintains for each vacancy announcement are retained for at least 2 years after the announced vacancy is filled. He said that by using the data maintained by OHR and the Civil Rights Office computerized files of employee race and sex data, it would be possible to reconstruct the race and sex makeup of the pool of persons at each stage of the competitive selection process, thereby providing internal applicant flow data.

[2]Qualification determinations are based on OPM's minimum qualifications specified in Civil Service Handbook x-118 and x-118c.

External Applicants' Race and Sex Data No Longer Collected

From January 1981 to December 1983, OPM and EEOC both required federal agencies to collect data on the race, sex, and ethnic origin of job applicants on OPM Form 1386, "Background Survey Questionnaire." We reported[3] that in December 1983, OPM informed federal agencies and departments that its requirement to collect applicant flow data was rescinded because the Office of Management and Budget's authorization to use OPM Form 1386 had expired. OPM told us it did not request reauthorization of the form because (1) no law or regulation required the collection of such data, (2) the data were not statistically reliable, and (3) collecting and processing the data was expensive.

In its comments included in our report, EEOC stated that it does not require agencies to collect applicant flow data, but said it encourages them to collect race, sex, and ethnic origin data on applicants for use in the analysis of selection barriers. We reported that EEOC's statement was inconsistent with Management Directive 707, which states that "agencies must begin immediately to collect and maintain applicant flow data." As of September 1986, Management Directive 707 had not been rescinded or modified to reflect a change in this requirement.

In our report, we said that OPM's and EEOC's positions regarding the collection of applicant flow data had government-wide significance and was not a matter that could be appropriately dealt with by HHS or other executive branch line agencies. We called this matter to the attention of the Congress by suggesting that the Congress consider exploring this situation with OPM and EEOC to clarify the agencies' positions concerning the collection of applicant flow data.

The deputy chief, Recruitment and Placement Branch, OHR, told us that SSA collected external applicant flow data from 1981 to 1985. He added that from 1983 to 1985 there was confusion in SSA regarding whether OPM Form 1386 should be used, but SSA continued to use it because no one ever told SSA to discontinue its use. He said that in March 1985, during an OPM review of SSA's mid- and senior-level positions, OPM officials informed his office that the form should no longer be used. The deputy chief told us that SSA discontinued using OPM Form 1386 in March 1985 and SSA has no plans to resume collecting applicant flow data from persons applying from outside the agency.

[3]Affirmative Action: National Institutes of Health Does Not Fully Meet Federal Requirements (GAO/HRD-86-37, Mar. 5, 1986).

No Barrier Analysis Reports Completed

At the time of our review, SSA either had not initiated the studies or had not completed the reports on studies identified in the SSA-wide multiyear affirmative action plan as headquarters "barrier analysis projects." This plan identified four barrier analysis projects to be conducted at SSA headquarters. These involved (1) reviewing the development and use of bridge positions[4] to reduce underrepresentation at higher grade levels, (2) assessing minorities' ability to compete for promotions, (3) examining the distribution of incentive awards, and (4) analyzing the internal competitive selection process to fill vacant positions.

According to an EEOC directive, a critical element of agency affirmative action planning is identifying personnel policies, procedures, and practices that may impede progress toward meeting affirmative action goals. Agencies are to conduct barrier analyses specifically to determine whether underrepresented groups experience disparate selection rates for personnel selection processes, including hiring, promotions, reassignments, and training opportunities. When an agency confirms that barriers exist, EEOC directives require the agency to establish action schedules to eliminate or reduce the barriers.

The director, SSA Civil Rights Office, is responsible for coordinating barrier analysis studies. That office's deputy director told us that the SSA headquarters barrier analysis projects are conducted by the Division of Evaluation and Special Projects, OHR, at the request of the Civil Rights Office. She said that completed studies are provided as drafts to the Civil Rights Office. The director of that office said that he has the option to modify study recommendations or make additional recommendations before the reports are considered final.

SSA has not initiated the study of bridge positions called for in the SSA-wide multiyear affirmative action plan. According to the director of the Civil Rights Office, the study was not started because of the pending impact of SSA's planned staff reduction.

The deputy director, Division of Evaluation and Special Projects, OHR, told us that around March 1986, his office began the barrier analysis of competitive promotions for bargaining and nonbargaining unit positions at SSA headquarters. The study was completed in August 1986, and the report has been drafted. The barrier analysis study on incentive awards at SSA headquarters has been completed and a report drafted, but the

[4]Bridge positions are paraprofessional in nature and allow employees to move from clerical to professional career paths after gaining requisite experience.

report has not been issued in final. The Civil Rights Office and OHR gave us copies of the draft reports, which identified a number of disparities involving minority groups, but neither study included recommendations to address the problems. In December 1985, and again in September 1986, officials of the Civil Rights Office informed us that these reports are considered to be drafts pending final review by their office.

The SSA-wide multiyear affirmative action plan stated that the internal competitive selection process would be analyzed. If the analysis indicated that underrepresented minorities were not selected in relation to the numbers that applied, further analysis of the process to identify potential barriers was warranted. Potential barriers could include appraisals, educational requirements, required work experience, and area of consideration. If barriers were identified, a study was to be conducted and plans developed to identify corrective actions to eliminate the barriers.

Barrier analyses concerning the internal competitive selection process are important to gauging SSA's affirmative action efforts, but at the time of our review, no barrier analysis studies of the internal selection process to fill vacant positions had been undertaken for positions in OCRO, ODO, OSI, or OSO.

SSA has not complied with EEOC affirmative action program requirements to identify and take corrective actions to remove possible artificial barriers that impede EEO. As discussed above, although two studies of personnel activities have been completed and the reports drafted, no reports had been finalized as of September 1986. The completion of these reports and analyses of the internal competitive selection process may enable SSA to identify possible artificial barriers to its affirmative action efforts. If barriers are found, SSA can act to eliminate or reduce them.

Impact of Skills Development Strategies Not Known

The SSA-wide multiyear affirmative action plan recognized that because of hiring restrictions, most changes to work-force EEO profiles would occur through internal promotions and reassignments to fill vacant positions. Accordingly, this plan emphasized the importance of developing employees' skills as an aid to improving its work-force EEO profile. In this regard, SSA's affirmative action plan stated it was SSA's policy to provide employees from targeted groups with the job skills required for higher graded positions. According to the SSA-wide plan, through formal and informal training programs, more individuals may become qualified

to compete for higher graded positions. The SSA-wide plan summarized a variety of skills development strategies available to components, including the use of

- individual development plans,
- reassignments to developmental positions, and
- course work and training classes.

We reviewed the affirmative action plans of OCO, OCRO, ODO, Systems, OSI, OSO, and OIS to determine planned developmental activities for selected mainstream job series. We also examined the annual accomplishment reports/updated affirmative action plans covering fiscal years 1983-86 prepared by these components to determine the extent to which activities to develop employees from targeted groups for higher graded positions were reported.

With the exception of OCRO and ODO, the multiyear affirmative action plans we reviewed specified targeted underrepresented groups for developmental activities. None of the plans, however, projected the number of employees to be trained, and only the OIS and OSO plans specified the type of training to be provided. With the exception of OIS, when developmental activities were reported, numerical achievements or other measurable actions were not specified. Rather, the accomplishment reports/updated plans included general statements regarding developmental activities such as "the component will continue to follow its multiyear plan . . ."

Therefore, we attempted to develop information on the extent to which these strategies were implemented by examining agency records and interviewing responsible officials. The results of our analysis were inconclusive, because in cases where these activities were reported, details by mainstream job series and targeted underrepresented groups were not included.

For example, OCO's, OSR's, OSI's, OSO's, and OIS's multi-year affirmative action plans included several broad objectives to train and develop its staff, as follows:

- To make effective use of available training and development resources to correct underrepresentation.
- To encourage the use of individual development plans to facilitate the career mobility opportunities of minority and female employees for positions in which they are underrepresented.

- To recommend or establish additional training and development activities as needs are identified consistent with available resources.

In its updated affirmative action plans, OCO reiterated its intentions to ensure that members of underrepresented groups are included in training or skills development activities for new jobs.

OCRO, in its multiyear and updated affirmative action plans, mirrored the wording included in the OCO plan above. ODO said it would develop tools specifically designed to improve minority group members' skills and give them opportunities to obtain the necessary experience to qualify for promotions. The ODO plan called for (1) managers to identify existing promotional barriers for minorities and provide necessary training and counseling to promote career mobility and (2) the compilation and distribution of a list of resources that could facilitate entry into positions with better career opportunities. The list was to include a description of bridge positions that provide related experiences and a list of self-improvement courses and task-oriented classes designed to develop employee potential and skills. As discussed below, generally, either these strategies were not implemented, or if they were, sparse documentation was available in the SSA components to demonstrate the results.

Individual Development Plans

The OSI fiscal year 1985 updated affirmative action plan stated that individual development plans were developed for all employees. In its fiscal year 1986 updated plan, OSI reported that it had implemented a tracking system for related training. In following up with OSI officials on these issues, we found that individual development plans, as defined by SSA, had been developed for all staff. But an OSI official told us that only a part of the tracking system has been implemented and no data on training had been collected as of October 1986.

Although, as discussed on page 46, the OCO multiyear plan said use of individual development plans would be encouraged, the OCRO and ODO affirmative action plans did not specifically state that individual development plans would be prepared for their employees. In this regard, OCRO and ODO seldom prepared individual development plans, although employees could request their supervisors' assistance in preparing them. An OCRO official estimated that over the last 3 years fewer than 10 had been prepared. An ODO official estimated that about six were in effect at the time of our review.

Reassignment Opportunities to Bridge Positions

Reassignment opportunities are available for OCRO and ODO employees. Officials from both components told us these reassignments—which include temporary work details, permanent reassignments, and temporary promotions—occur frequently in OCRO and ODO. Data developed by the Civil Rights Office to monitor reassignments in Systems, OCRO, and ODO showed the numbers of employees that were reassigned by race and sex and by grade band within mainstream job series. The data, however, were not sufficient to determine whether the reassignments were for career development purposes. Furthermore, OCRO and ODO do not maintain reassignment data. The data on reassignments in SSA were generated and used by the Civil Rights Office. The director of that office said that his office's monitoring of reassignments is not tailored for affirmative action reporting (i.e., targeted minority group to targeted position.) SSA officials told us that no changes are planned regarding the collection and maintenance of reassignment information.

Training Opportunities

For SSA technical training, which is provided to enhance a person's skills in his/her current position, all staff in a given position are given the chance to participate. For management training, which is designed to prepare participants for increased managerial responsibilities, the staff must compete to be selected.

According to SSA's Office of Training officials, technical training is provided to all employees as needed; therefore, race and sex are not considered when staff are selected to participate in training required for their present positions. Office of Training officials said that aggregate data are compiled on the race and sex of training participants regarding training programs for which SSA employees are required to compete. These aggregate data, however, are not sufficient to determine whether targeted underrepresented group members have received training needed to compete for higher graded positions.

Based on information we obtained on six competitive training programs, SSA headquarters is providing management training opportunities for blacks and women. Overall for these six programs, about 18 percent of the participants were black and 33 percent were women.

Table 4.1 summarizes the numbers of headquarters participants in these programs by race and sex for the most recent year data were available.

Table 4.1: Summary of Blacks' Participation in SSA Headquarters Management Training Programs

Training program	All participants			Black participants		
	Male	Female	Total	Male	Female	Total
SSA management intern (1982)	3	5	8	1	2	3
HHS management intern (1982)	6	6	12	1	1	2
Management development (1983)	7	8	15	2	3	5
Advanced managers (1982)	6	8	14	1	0	1
Senior executive service (1982)	4	1	5	2	0	2
Centrally funded executive and management training (1986)	117	44	161	16	10	26
	143	**72**	**215**	**23**	**16**	**39**

According to an Office of Training official, that office does not analyze the race and sex profiles of training participants. We found, however, examples where components' monitoring of competitive training was directed to ensure that minorities were selected for training opportunities in proportion to their relative numbers in the work force.

OSO's and OIS's accomplishment reports/updated plans included data on the number of persons assigned to training. OSO's fiscal years 1985-86 accomplishment report/updated plan stated that all technical employees were assigned to a curriculum with the U.S. Department of Agriculture Graduate School. The OIS fiscal years 1985-86 accomplishment report/updated plan identified—by race, sex, and grade band—the number of actual underrepresented group members participating in technical/managerial courses. Only the OIS accomplishment report/updated plan identified whether the individuals were from underrepresented minority groups within mainstream job series.

Conclusions

Because applicant flow data are not compiled, SSA and its components cannot evaluate their affirmative action efforts, as required by EEOC, to identify possible employment barriers to underrepresented minority groups. Absent barrier identification, SSA cannot develop and implement effective strategies to reduce or eliminate obstacles, which may hamper minorities' advancement opportunities. Without more detailed reporting on components' skills development activities for underrepresented group members, SSA does not know the extent to which developmental opportunities are being made available to targeted underrepresented minority group members.

These factors—applicant flow data, barrier analyses, and barrier elimination—are all necessary to comply with EEOC's program requirements.

SSA is not complying with these requirements and, as a result, cannot fully evaluate the impact of its affirmative action strategies for targeted underrepresented minority groups. If SSA headquarters components acted to fully comply with EEOC's requirements and routinely reported on their developmental activities to improve the advancement opportunities for minorities, SSA could better evaluate its affirmative action efforts and redirect its strategies as needed.

Recommendations

We recommend that the Secretary of HHS direct the Commissioner of SSA to bring the affirmative action program into compliance with EEOC directives by requiring that SSA

- compile race and sex profile data for all stages of the internal selection process, including data on all qualified applicants, best qualified candidates, and selectees for job vacancies, and
- identify and act to reduce or eliminate artificial barriers that adversely affect the advancement of underrepresented minority groups.

Also, the Secretary should direct the Commissioner to request SSA organizational components to include data in the annual accomplishment reports on skills development activities—such as individual development plans, bridge position reassignments, and training opportunities—for targeted underrepresented minority groups.

Agency Comments

HHS, in its written comments on our draft report, generally agreed with our recommendations to the Secretary to direct the SSA Commissioner to (1) compile race and sex profile data for all stages of the internal selection process and (2) identify and act to reduce or eliminate artificial barriers that have an adverse impact on the advancement of underrepresented minority groups.

HHS also concurred with our recommendation to include data on skills development activities in annual accomplishment reports. The Department stated, however, that it would not be feasible to implement this recommendation until the end of fiscal year 1987, when the next SSA multiyear affirmative action plan is to be developed.

Black Employees and Total Employees for All Job Series in OCRO Headquarters, ODO, and Systems as of 1982 and 1985

	Total employees		Black females		Black males	
Components	**1982**	**1985**	**1982**	**1985**	**1982**	**1985**
OCRO headquarters:						
Grades 1-4	1,624	1,372	1,105	922	112	113
5-8	1,834	1,734	1,114	1,136	109	82
9-10	284	281	104	121	25	26
11-12	68	114	17	34	3	4
13-15	28	28	2	3	6	7
All grades	3,838	3,529	2,342	2,216	255	232
ODO:						
Grades 1-4	2,352	1,776	1,409	1,125	242	191
5-8	1,999	1,812	808	871	125	151
9-10	721	905	214	264	34	38
11-12	718	650	151	155	42	35
13-15	120	124	2	9	13	12
All grades	5,910	5,267	2,584	2,424	456	427
Systems:						
Grades 1-4	235	192	104	100	34	30
5-8	634	618	169	183	50	52
9-10	184	203	30	33	14	17
11-12	1,130	1,293	69	102	53	52
13-15	593	645	11	12	21	25
All grades	2,776	2,951	383	430	172	176

Employment Rates[a] of Blacks for All Job Series in OCRO Headquarters, ODO, and Systems as of 1982 and 1985

Rates in percents

	Black females		Black males	
	1982	1985	1982	1985
OCRO headquarters:				
Grades 1-4	68.0	[67.2]	6.9	8.2
5-8	60.7	65.5	5.9	[4.7]
9-10	36.6	43.1	8.8	9.3
11-12	25.0	29.8	4.4	[3.5]
13-15	7.1	10.7	21.4	25.0
All grades	61.0	62.8	6.6	6.6
ODO:				
Grades 1-4	59.9	63.3	10.3	10.8
5-8	40.4	48.1	6.3	8.3
9-10	29.8	[29.2]	4.7	[4.2]
11-12	21.0	23.8	5.9	[5.4]
13-15	1.7	7.3	10.8	[9.7]
All grades	43.7	46.0	7.7	8.1
Systems:				
Grades 1-4	44.3	52.1	14.5	15.6
5-8	26.7	29.6	7.9	8.4
9-10	16.3	16.3	7.6	8.4
11-12	6.1	7.9	4.7	[4.0]
13-15	1.9	1.9	3.5	3.9
All grades	13.8	14.6	6.2	[6.0]

[a]Figures in brackets indicate employment rate reduction from 1982 to 1985.

Black Employees and Total Employees for Five Mainstream Job Series as of Base Year[a] and 1985

	Total employees		Black females		Black males	
	Base year	1985	Base year	1985	Base year	1985
OCRO-claims clerical:[b]						
Grades 1-4	332	242	259	190	24	15
5-8	1,146	1,260	710	866	72	57
9-12[c]	207	217	91	101	16	17
13[d]	4	4	0	1	2	1
All grades	1,689	1,723	1,060	1,158	114	90
OCRO-general clerical and administrative:[b]						
Grades 1-4	698	81	458	49	83	12
5-8	568	169	233	102	147	5
9-10	21	15	7	4	5	3
11-12	7	19	3	8	0	0
13[d]	1	2	0	0	0	0
All grades	1,295	286	701	163	235	20
ODO-social insurance claims examiner:						
Grades 4[d]	253	42	87	17	38	7
5-8	1,106	1,053	328	416	53	96
9-10	721	888	202	257	30	36
11-12	623	546	122	134	39	31
13-14	15	20	1	1	1	2
All grades	2,718	2,549	740	825	161	172
ODO-mail and file clerk:						
Grades 1-4	1,283	1,079	791	673	162	155
5-8	268	276	157	186	23	26
9-10	2	2	1	1	0	0
11[d]	1	0	1	0	0	0
All grades	1,554	1,357	950	860	185	181

	Total employees		Black females		Black males	
	Base year	1985	Base year	1985	Base year	1985
Systems-computer specialist:						
Grades 5-8	37	72	3	6	1	7
9-10	57	84	9	11	2	9
11-12	573	763	23	49	33	35
13-15	340	415	5	9	11	16
All grades	1,007	1,334	40	75	47	67

[a]Base year data were as of June 30, 1982, for OCRO's mainstream job series and as of September 30, 1981, for ODO's and Systems' mainstream job series.

[b]Base year data include OCRO field positions.

[c]Grades bands 9-10 and 11-12 were not separately available.

[d]In some cases, the mainstream job series did not cover the entire grade band.

Black Female and Male Employment Rates for Five Mainstream Job Series

To determine underrepresentation, the employment rates for black females and black males were compared by grade bands 1-4, 5-8, 9-10, 11-12, and 13-15, as of the base year and June 30, 1985, with the appropriate civilian labor force employment rate statistics. Underrepresentation exists when a minority group's rate of employment in SSA, divided by the appropriate civilian labor force rate, is less than 100 percent. OCRO and ODO use the Baltimore statistics for grades 12 and below to determine underrepresentation of minority groups for the mainstream job series identified in table IV.1 and national statistics for grades 13 and above.

Systems uses the national statistics to determine underrepresentation at all grades for computer specialist positions. (National statistics are used when an agency recruits nationwide to fill vacant positions.) This analysis is presented in table IV.1.

Table IV.1: Employment Rates[a] of Blacks for Five Mainstream Job Series as of Base Year and 1985

Rates in percents

	Black females		Black males	
	Base year	1985	Base year	1985
Civilian labor force				
Baltimore area	10.1	11.2	11.7	11.1
National	4.8	4.8	5.2	4.9
SSA's work force[b]				
OCRO-claims clerical:				
Grades 1-4	78.0	78.5	[7.2]	[6.2]
5-8	62.0	68.7	[6.3]	[4.5]
9-12[c]	44.0	46.5	[7.7]	[7.8]
13[d]	[0]	25.0	50.0	25.0
All grades	62.8	67.2	6.8	5.2
OCRO-general clerical and administrative:				
Grades 1-4	65.6	60.5	11.9	14.8
5-8	41.0	60.4	25.9	[3.0]
9-10	33.3	26.7	23.8	20.0
11-12	42.9	42.1	[0]	[0]
13[d]	[0]	[0]	[0]	[0]
All grades	54.1	57.0	18.2	7.0

	Black females		Black males	
	Base year	1985	Base year	1985
ODO-social insurance claims examiner:				
Grades 4[d]	34.3	40.5	15.0	16.7
5-8	29.6	39.5	[4.7]	[9.1]
9-10	28.0	28.9	[4.2]	[4.1]
11-12	19.6	24.5	[6.3]	[5.7]
13-14	6.6	5.0	6.6	10.0
All grades	27.2	32.4	5.9	6.7
ODO-mail and file clerk:				
Grades 1-4	61.6	62.4	12.6	14.4
5-8	58.5	67.4	[8.5]	[9.4]
9-10	50.5	50.0	[0]	[0]
11[d]	100.0	[e]	[0]	[e]
All grades	61.1	63.4	11.9	13.3
Systems-computer specialist:				
Grades 5-8	8.1	8.3	[2.7]	9.7
9-10	15.8	13.1	[3.5]	10.7
11-12	[4.0]	6.4	5.8	[4.6]
13-15	[1.4]	[2.2]	[3.2]	[3.9]
All grades	[3.9]	5.6	[4.6]	5.0

[a]The figures in brackets identify underrepresentation based on comparisons of SSA employment rates with Baltimore area or national civilian labor force data.

[b]Base year data were as of June 25, 1982, for OCRO's mainstream job series and as of September 30, 1981, for ODO's and Systems' mainstream job series.

[c]Grades bands 9-10 and 11-12 were not separately available.

[d]In some cases, the mainstream job series did not cover the entire grade band.

[e]One person held this position as of the base year, but the position was abolished as of June 30, 1985.

Comparison of SSA Components' Reporting on the Mainstream Job Series in SSA-Wide Multiyear and Fiscal Year 1984 Updated Affirmative Action Plans

SSA-wide mainstream job series number and title		SSA components						
		OCO	OCRO	ODO	OSI	OSR	OSO	OIS
935	Administrative law judge	•	•	•	•	•	•	•
998	Claims clerical	*	*	*	N	•	•	•
322	Clerk-typist	N	A	A	N	N	N	N
334	Computer specialist	N	N	N	*	N	*	*
962	Contact representative	N	•	•	•	•	•	•
356	Data transcriber	*	*	A	•	N	•	•
301	General clerical and administrative	N	*	*	N	N	N	N
986	Legal clerk and technician	•	•	•	•	•	•	•
305	Mail and file clerk	*	A	*	•	•	•	•
303	Miscellaneous clerk and assistant	N	A	A	N	N	N	N
950	Paralegal specialist	N	•	N	•	•	•	•
345	Program analysis	*	A	N	N	•	N	•
318	Secretary (steno or typing)	N	A	N	*	*	N	N
993	Social insurance claims examiner	*	A	*	N	N	N	N
105	Social insurance administration	N	A	N	N	*	N	N

Consistent reporting with SSA-wide plan
* = Reported as a mainstream job series.
• = No employees in job series.

Inconsistent reporting with SSA-wide plan
A = Included in "all other" category.
N = Not reported as a mainstream job series nor included in "all other" category; however, components/subcomponents had employees in these job series.

Comments From the Department of Health and Human Services

DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Washington, D.C. 20201

DEC 24 1986

Mr. Richard L. Fogel
Assistant Comptroller General
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Fogel:

The Secretary asked that I respond to your request for the Department's comments on your draft report, "Affirmative Action: Social Security Administration Can Do More To Improve Blacks' Representation in Its Work Force." The enclosed comments represent the tentative position of the Department and are subject to reevaluation when the final version of this report is received.

We appreciate the opportunity to comment on this draft report before its publication.

Sincerely yours,

Richard P. Kusserow
Inspector General

Enclosure

COMMENTS OF THE SOCIAL SECURITY ADMINISTRATION ON THE GENERAL ACCOUNTING OFFICE'S DRAFT REPORT, "SOCIAL SECURITY CAN DO MORE TO IMPROVE BLACKS' REPRESENTATION IN ITS WORK FORCE."

General Accounting Office (GAO) Recommendation

That the Secretary of Health and Human Services (HHS) direct the Commissioner of the Social Security Administration (SSA) to integrate the SSA-wide affirmative action plan into components' plans.

Department of Health and Human Services' (DHHS) Comment

You recommend that SSA prepare integrated plans; we believe our plan is already integrated, and we are getting better results than we would have achieved by strictly following the Equal Employment Opportunity Commission (EEOC), HHS guidelines.

In the Executive Summary and throughout the report, the General Accounting Office (GAO) has criticized the structure of the SSA-wide plan. One must look at all, not merely three, subplans to see the relationship of the SSA-wide plan to all others. In actuality, SSA has gone beyond the requirements of both EEOC and HHS by establishing SSA-wide 23 mainstream jobs. Under this construction, some components of less than 500 people have plans whereas this would not have been required by HHS or EEOC. Strict adherence to the guidelines would have resulted in only seven mainstream jobs targeted.

GAO Recommendation

Require components to report affirmative action accomplishments with sufficient information to determine whether affirmative action goals and objectives are achieved.

DHHS Comment

We disagree with this recommendation. Component affirmative action accomplishments are reported with sufficient information to determine if affirmative action goals and objectives are achieved.

Now on pp. 35 to 39.

The information on pages 38 through 40 in your draft report from which this recommendation was formulated indicates, in our judgement, that GAO only reviewed EODS Tables 1 and 2. These tables are intended to report only the ending workforce EEO profiles comparison of a current and a preceding period. It would appear that component EODS Personnel Transaction Tables 4, 5, 6, 7, 8, 9, and 10 were not reviewed. Respectively, these tables show the number and percent by grade group and race, sex,

national origin; the change in representation; accessions; conversions; competitive reassignments; non-career ladder promotions and career ladder promotions. Therefore, contrary to GAO conclusions, sufficient information is reported to determine accomplishment of goals and activity even though the information is not recorded at the component level on EEOC forms 508 and 509.

SSA reports this information on EEOC forms 508 and 509 in the SSA-Wide Affirmative Action Accomplishment Report as required by HHS and EEOC instructions and guidelines.

GAO Recommendation

Compile race and sex profile data on all stages of the internal selective process.

DHHS Comment

We agree with this recommendation. This was stated in the original Multi-Year Plan but was not carried through because of choices that had to be made concerning limited programming resources. Implementation of this recommendation will require Office of Systems' resources both for the programming and printing of data on schedule.

GAO Recommendation

Identify and act to reduce or eliminate artificial barriers which have an adverse impact on the advancement of underrepresented minority groups.

DHHS Comment

We concur with this recommendation. The major headquarters barrier studies which OCREO has received will be forwarded with recommendations to the Senior Staff within 30 days.

GAO Recommendation

Include data in the annual accomplishment reports on skills development activities.

DHHS Comment

While we concur with the recommendation, implementation may have to be deferred. We are in the final 9 months of a 1-year extension of the Multi-year Affirmative Action Plan (MYAAP) and do not believe we can require all components to develop a system for tying in skill development programs to the mainstream jobs within this period of time. We believe it will be feasible to do it when the next MYAAP is developed in September 1987.

General Comments

Now on p. 18.

Page 11, Paragraph 1

We cannot agree with the reasons stated for the failure of women to be fully represented in higher grades. Women have always been in the claims and other technical series for which men have been selected. Therefore, to say they have only recently entered the series is not accurate. Through concentrated initiatives such as the Management Development Program, and the Advanced Development Program, and affirmative action, more women are being selected for higher level jobs.

White females have also been recruited externally through written examination. In fact, 56 percent of the employees in the 105 claims series in 1984 were female.

Now on p. 20.

Page 16

The underrepresentation indices identified in the HHS memorandum are a deviation from EEOC guidelines and were issued in 1983 for the 1984 plan.

Now on p. 29.

Page 28

We do not agree with the GAO comment that strategies cannot be changed without structured barrier identification. Some components, through analyzing the EO data distributed by OCREO, modify their strategies, particularly internal recruitment and skills assessment. Components vary in their approach to planning, implementation and monitoring.

Now on p. 31.

Page 32, Paragraph 1

The report gives the impression that we did not require plans below the Associate Commissioner (second) level. This is not true. We directed that plans be developed at subordinate levels; i.e., certain offices and levels. The Appendix C, "Organization Structure for Plan Preparation," delineated both component level and mainstream jobs. This includes the Office of Central Operations (OCO), the Office of Disability Operations and other OCO subcomponents.

Now on p. 32.

Page 34, Paragraph 2

OCREO named the mainstream job series basing the decision on the criteria in EEOC guidelines (quote, page 15, section 4 of guide).

Now on p. 33.

Page 34, Paragraph 3 and Page 35, Paragraph 1

The numbers of persons in nonmainstream jobs constitute a very small percentage of that particular component's workforce. Although the numbers may appear significant, they are too small to be considered most populous for that particular component. They do not meet the EEOC criteria for mainstream job series.

Now on p. 34.

Page 36

Although HHS required no goals, SSA in its 1982 plan did establish internal recruitment goals. Also, the Memorandum of Understanding with the American Federation of Government Employees, signed on July 20, 1983, committed SSA to develop external and internal goals in accord with Governmentwide guidelines beginning July 1, 1984. OCREO set goals for each component plan.

Now on pp. 35 to 36.

Pages 38-39

For the SSA components, the Equal Opportunity Data System Tables 4 and 5 distributed by OCREO, serve the same purpose as EEOC forms 508 and 509.

OCREO does not prepare component accomplishment reports. They provide the data; components do their own analyses. All components do not analyze or track opportunities in the same manner. OCREO prepares the SSA-wide accomplishment report. This report covers all mainstream jobs in SSA.